

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Return Date: October 21, 2025 at 10:00AM

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In re

Chapter 7
Case No. 22-41410-jmm

Fraleg Group, Inc.,
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AFFIRMATION IN PARTIAL OPPOSITION TO
CHAPTER 7 TRUSTEE'S MOTION

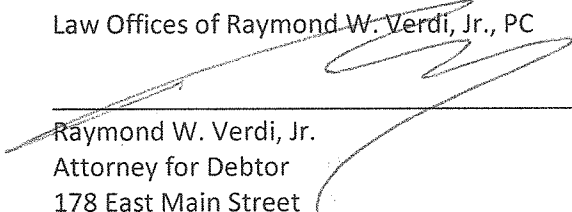
Raymond W. Verdi, Jr., duly affirms under the penalties of perjury as follows:

1. I am an attorney admitted to practice law in the State of New York and the United States Bankruptcy Court for the Eastern and Southern Districts of New York.
2. I am the attorney for the debtor and am familiar with the facts and circumstances of this case.
3. On September 26, 2025, my office received from the debtor the documents requested by the Chapter 7 Trustee regarding its purchaser of real property at 112 North Walnut Street, East Orange, New Jersey and 116 North Walnut Street, East Orange, New Jersey. I thereafter forwarded the documents to the Chapter 7 Trustee by email to him directly on September 26, 2025. These documents included closing statements and related title documents.
4. At this time, I believe the debtor has complied with the requests stated in the Trustee's motion related to the production of documents. Additionally, the principals of the debtor, Ron Fraser and Andy Alege, will appear for any additional examinations as needed based on this recent production of documents.
5. For the above reasons, the debtor does not specifically object to the issuance of a new Order requiring the debtor and its principals to comply with the Trustee's requests for any additional documents and/or examinations, but objects to the issuance of any form of sanction against them.

WHEREFORE, it is respectfully requested that this Court deny in part this motion as stated above, and for such other and further relief as this Court deems just and proper.

Dated: Patchogue, New York
September 29, 2025

Law Offices of Raymond W. Verdi, Jr., PC



Raymond W. Verdi, Jr.
Attorney for Debtor
178 East Main Street
Patchogue, NY 11772
(516) 380-9064

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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IN RE

Chapter 7

Fraleg Group Inc.,

Case No. 24-41410-jmm

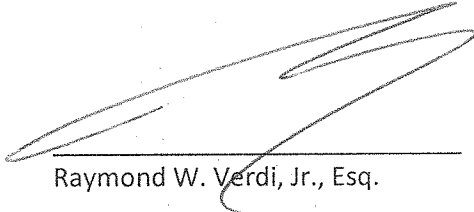
Debtor.
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I, Raymond W. Verdi, Jr., Esq., in accordance with CPLR 2106, under the penalties of perjury, hereby affirm:

I am not a party to the action, am over 18 years of age and reside in East Islip, New York.

On September 29, 2025, I mailed a copy of the Affirmation in Partial Opposition to Chapter 7 Trustee's Motion seeking Order Directing Debtor's Compliance and Awarding Fees via regular first class postage paid mail by depositing a true copy thereof enclosed in a first class postage pre-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to the Office of the U.S. Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 510, New York, NY 10004-1415; and Certilman Balin Adler & Hyman, LLP, 90 Merrick Avenue, 9th Floor, East Meadow, NY 11554, Attn: Richard J. McCord, Esq.

Dated: September 29, 2025
Patchogue, New York



Raymond W. Verdi, Jr., Esq.